



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

Ref: 8MO

June 9, 2005

Mr. Bill Avey,
District Ranger,
Big Timber Ranger District,
P.O. Box 1130,
Big Timber, MT 59011-1130

Re: CEQ 20050179; Main Boulder Fuels
Reduction Project Draft Supplemental EIS

Dear Mr. Avey:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the Main Boulder Fuel Reduction Project.

We appreciate the additional analysis of potential effects to the Northern Goshawk. The DSEIS replaces the effects analysis for the Northern Goshawk in the Main Boulder Fuel Reduction Project FEIS. The DSEIS indicates that the proposed project may impact individuals or habitat, but would not lead to a trend toward federal listing of northern goshawks or loss of viability, and predicts that the proposed project will not result in cumulative adverse effects to the goshawk population in the Main Boulder River drainage.

We are pleased that additional surveys would be conducted annually for sensitive species and management indicator species (MIS) in the treatment areas (Northern goshawk, flammulated owl, northern leopard frog, etc.,) in order to avoid any potential impacts and gather additional baseline data, and satisfy the species viability requirement of NFMA. EPA very much supports monitoring to determine ecological effects of the implementation of forest management activities. It is only through monitoring of ecological effects that the USFS will be able to determine whether management goals and objectives are being met.

As indicated in our earlier comments, we do not object to the proposed fuels reduction project. We understand the need to reduce fuel loadings and fire hazards and provide for public and firefighter safety, and extend the potential time available for evacuation of Boulder River canyon along the Main Boulder Road in the event of a wildfire in the canyon. Our chief concerns regard potential impacts to water quality, fisheries and riparian habitat, and we emphasize the



need to design and implement timber harvests and road access in a manner that protects water quality, fisheries habitat and riparian integrity and functioning. The Boulder River is recognized as a regional and national recreational fishery, and is designated a Class A stream to be managed to maintain at least 90% of inherent fisheries habitat potential. This valuable water quality and fisheries resource must be protected as fuel loadings and fire hazards are reduced.

The EPA appreciates the opportunity to review and comment on the Draft Supplemental EIS. If you have any questions please contact Mr. Steve Potts of my staff in Helena at (406) 457-5022 or in Missoula at 406-329-3313.

Sincerely,

/S/

John F. Wardell
Director
Montana Office

cc: Larry Svoboda/Julia Johnson, EPA 8EPR-N, Denver
Barbara Ping, ID Team Leader, Bozeman Ranger District

SUMMARY PARAGRAPH FORM

ERP NUMBER

RATING ASSIGNED TO PROJECT

EC-2

**NAME OF EPA OFFICIAL RESPONSIBLE
FOR REVIEW OF PROJECT (Principle Reviewer)**

Steve Potts

SUMMARY OF COMMENT LETTER

The EPA has reviewed the Main Boulder Fuel Reduction Draft Supplemental Environmental Impact Statement (DSEIS) prepared by the Gallatin National Forest. The EPA appreciated the additional analysis of potential effects to the Northern Goshawk, and was pleased that it was predicted that the proposed project will not result in adverse effects to the goshawk population in the Main Boulder River drainage. EPA understands the need to reduce fuels and fire risk and increase public and firefighter safety in the Boulder River Canyon, although EPA has concerns about potential effects on water quality, fisheries and riparian functions and habitats.

PARAGRAPH APPROVED FOR PUBLICATION

**(Initials of OFA
Approving Official)**

NOTE: Transmit 2 copies to MIU

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